

From: [Anne Turnbough](#)
To: [Laws, Meredith](#)
Cc: [Eagle, Venus](#); [Rate, Debra](#); [Anne Turnbough](#)
Subject: 53883- CSI/ Imidacloprid
Date: Friday, August 30, 2013 2:10:25 PM
Attachments: [Response to EPA - Imidacloprid - Pollinator language 8-29-2013.doc](#)

Thanks Meredith. There may be confusion on MANA end on who is receiving. No worries, we all have copies now.

Please see response from CSI that is being sent to EPA in response to August 15th letter ?

Wishing you all a wonderful weekend,

Anne

From: Laws, Meredith [mailto:Laws.Meredith@epa.gov]
Sent: Thursday, August 29, 2013 2:48 PM
To: Anne Turnbough
Cc: Eagle, Venus; Rate, Debra
Subject: RE: 53883- CSI/ Imidacloprid

MANA did receive it, I have email confirmations from them.

From: Anne Turnbough [mailto:aturnbough@ControlSolutionsInc.com]
Sent: Thursday, August 29, 2013 3:28 PM
To: Laws, Meredith
Cc: Eagle, Venus; Rate, Debra
Subject: RE: 53883- CSI/ Imidacloprid

- No worries, I think MANA also did not receive and many of us received from RISE. Appreciate the input below.

Anne

From: Laws, Meredith [mailto:Laws.Meredith@epa.gov]
Sent: Thursday, August 29, 2013 1:52 PM
To: Anne Turnbough
Cc: Eagle, Venus; Rate, Debra
Subject: RE: 53883- CSI/ Imidacloprid

Anne:

I don't know why you didn't receive the letter. I just checked my outgoing email and you are on the address list – and since your email is in my list of contacts, I used that. It matches the address of this email you just sent. I don't know where it went wrong. Would you like me to re-send it to you?

The granular products are exempt. The labeling only applied to the products that are applied

foliarly. I'm copying Venus and Debra Rate on this, if you have a question regarding a specific product, they can answer it for you.

Are you leaving CSI for another company?

Meredith

From: Anne Turnbough [<mailto:aturnbough@ControlSolutionsInc.com>]
Sent: Thursday, August 29, 2013 2:22 PM
To: Laws, Meredith
Subject: 53883- CSI/ Imidacloprid
Importance: High

Hi Meredith,

A quick question for clarification.

- CSI never received a copy of the Aug 15th letter (Sr. Bradbury attached) – so I am now trying to determine if this was just an oversight or whether CSI is still required to make changes to Imidacloprid registrations on file.

We also have several granular products that may be exempt per letter.

I am leaving CSI and am trying to ensure that I take care of all amendments prior to my departure.

Let me know your thoughts,

Anne

EPA Reg. No	EPA Name
53883-198	IMI Termite G
53883-199	IMI 0.5G Insecticide
53883-201	IMI 75 Insect. In Water Soluble Packets
53883-205	IMI 1.47% Concentrate
53883-214	IMI Tech
53883-217	IMI 0.22 G Plant Granules
53883-219	IMI 0.3 G
53883-221	IMI 2lb flowable
53883-225	Dominion 4 lb
53883-226	IMI 0.22 G T & O Insecticide
53883-227	IMI 1.0% G Insecticide
53883-229	IMI 2lb Insecticide
53883-230	IMI Lambda G Insect Granules
53883-232	IMI 2lb Greenhouse&Nursery Insecticide
53883-237	IMI 4lb Insecticide
53883-238	CSI Fly Bait
53883-252	Dominion 1.47 Plus Lambda 0.5% Liquid

53883-256	IMI 0.22 G Ready to Spread Gran
53883-275	IMI 0.235
53883-GEI	CSI Imidacloprid + Fipronil SC

From: Laura Phelps [<mailto:lphelps@manainc.com>]
Sent: Thursday, August 29, 2013 7:16 AM
To: Anne Turnbough
Subject: FW: EPA Releases Bee Hazard Label Language (Pollinator Protection Box & Directions for Use)
Importance: High

See attached for EPAs second letter.

From: Dudley Hoskins [<mailto:DHoskins@pestfacts.org>]
Sent: Thursday, August 15, 2013 10:49 AM
To: Laura Phelps
Subject: FW: EPA Releases Bee Hazard Label Language (Pollinator Protection Box & Directions for Use)
Importance: High

Laura,

Per your request, please see attached.

Dudley W. Hoskins
Manager, Regulatory Policy

RISE

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www.pestfacts.org

www.debugthemyths.com

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From: Dudley Hoskins
Sent: Thursday, August 15, 2013 10:48 AM
To: Ahlers, Erin; Akers, Rodney; Allison Donaghy; Alvis, Jeff; Anderson, Beth; Ashley, Rebecca; Assaf, Nasser; Barlow, Dave; Baxter, Jim; Berger, Jonathan; Beyer, Wayne; Bodey, Paula; Brodie, Katrina; Brunlinger, Michelle; Hunter Carpenter; Cosky, Steve; Covert, Jeanette; DeCarlo, Jennifer; Duke, Marcia; Emory, Edie; Flanagan, Laurie; Fulcher, Allan; Healey, Tim ; Aaron Hobbs; Holihan, Jill; Dudley Hoskins; Houseworth, Doug; Hutcheson, Sherry; Janus, Erik; Jason Blake (jblake@thepondguy.com); John Lublinkhof; Kimberly Dickinson; Kuhle, Jim; Larson, Karen; Lennan, Tom; Lilly, Jennifer; Mason, Chris; Maurer, Eric; Mavian, Kari; McKeel, Chava; Jean McMahon; Meindl, George; Messina, Jim; Mezin, Laurent; Olzinger, John; Ostrowski, Jonathan; Parenti, Evan; Peterson, John; Rea, Liz; Karen Reardon; Rise Regulatory; Rice, Patricia; Rowe, Dennis; Schafer, Tann; Schlekau, Julie; Schmit, Thomas; Sell, Doug; Sharp, Janice; Shearer, Karen; Skibba, Chris; Spagnoli, Julie; Spragins, Cisse; Starlyn Fikkert

(Starlyn.fikkert@VLSci.com); Tackema, Carrie M.; Theodorakis, Tim; Thomas, Dana; Trostle, Mark; Turnbough, Anne; Vickers, Matt; Wendelburg, Brian; Wright, John; Yentel, Jennifer; Zentner, Audra; Ziehr, Debbie; Zurcher, Corina

Subject: EPA Releases Bee Hazard Label Language (Pollinator Protection Box & Directions for Use)

Importance: High

Dear RAC:

EPA has just released the attached bee hazard label language and the attached directions for use, which are effective immediately for all products that have outdoor foliar use directions (except granulars) containing the active ingredients clothianidin, dinotefuran, imidacloprid, or thiamethoxam, regardless of formulation, concentration, or intended user.

Please see our attached memo summarizing requests for exemptions, concerns, and requests for additional information submitted to EPA during this process. Part of our input and facilitation during these discussions between EPA and the registrants subject to this label language has been over the potential precedent and process undertaken to implement these changes.

We are reviewing appropriate next steps. In the interim, please let us know if you have any questions.

Regards,
dudley

Dudley W. Hoskins

Manager, Regulatory Policy

RISE

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